



CITY OF SANTA BARBARA

COUNCIL AGENDA REPORT

AGENDA DATE: June 22, 2010

TO: Mayor and Councilmembers
Planning Commission

FROM: Planning Division, Community Development Department

SUBJECT: Joint Council and Planning Commission Work Session: *Plan Santa Barbara* General Plan Update

RECOMMENDATION:

That Council hold a joint work session with the Planning Commission to receive a status report on the *Plan Santa Barbara (PlanSB)* General Plan Update process, discuss key decision points, and provide direction on Planning Commission policy recommendations.

DISCUSSION:

***Plan Santa Barbara* General Plan Update - Status**

At the last joint work session on February 11, 2010, the Council was briefed on the status of *PlanSB* General Plan Update. The briefing included:

- Goals, Progress, Framework, Deliverables, Timeline
- Areas of Agreement/Unresolved Issues
- Results of Updated General Plan
- Growth Alternatives Analysis
- Refinements to *PlanSB* "Project"
- Budget

Since the release of the draft General Plan Update document and associated Draft Environmental Impact Report (DEIR) on March 18th, the Planning Commission has held four meetings to hear from the community, deliberate, and develop their preliminary policy recommendations. These preliminary recommendations are set forth below for Council review and input to staff and the Planning Commission in order to complete the final recommendations this fall.

The two Planning Commission staff reports and related presentations for April 28th & 29th, May 6th, and June 3rd, have been forwarded to Council under separate cover. In addition, a Council reading file has been created with all public comments received from

agencies, organizations and individuals during the 60 days review period that closed May 17, 2010; these comments are also available on the YouPlanSB.org website. For a complete list of all those who commented see Attachment 1, *Draft GPU and DEIR Public Comments Received 5-17-10*.

The purpose of this work session is two-fold. On June 22nd at 6:00 p.m., the Planning Commission and staff will brief the Council on the status of the *Plan Santa Barbara* and hear public comment. On June 23rd at 1 p.m., Council will discuss the key decision points and provide direction on the Planning Commission policy recommendations as outlined below.

Planning Commission Recommendations

The Planning Commission has unanimously affirmed the sustainability framework and sustainability principles that have guided this update to the General Plan (see pp. 23-28, *Santa Barbara General Plan*, Draft for Public Review, March 2010). Their package of recommendations outlined below is extracted from the General Plan Update policy document and DEIR, and represents the key decisions that are needed to move forward.

The full Commission has discussed and supported these items as a majority. The final straw poll on this recommendation package was 5 to 1 in favor, with Commissioner Lodge dissenting and Commissioner Jacobs absent at the time of the vote.

Hybrid Approach: Selecting the best components from each of the four growth scenarios analyzed in the DEIR, the Planning Commission is forwarding a package of key policy recommendations that meet the following criteria:

- Mitigate **environmental impacts** to the maximum extent feasible;
- Maximize the achievement of **Plan Objectives** set forth in the framework and principles, including Living within Our Resources;
- Achieve **internal consistency** among the policies;
- Ensure the policies are **operational** and capable of being implemented;
- Stimulate **economic vitality**.

Growth Management: Limit future non-residential growth to **one million square feet** over the next twenty years. Staff will be meeting with the Planning Commission during the summer to discuss the Development Plan Ordinance (Measure E) update, including defining the appropriate development allocation categories, required findings for project approvals, and the disposition of approximately 700,000 sq ft of pending and approved projects.

Targeted Growth: The location for the next increment of growth is recommended to be located principally in the downtown and commercial districts to both reduce environmental impacts and work together to re-enforce these districts as economically viable, culturally significant, and healthy, livable places. Multiple plan objectives coincide in these locations including: more **workforce housing**; **reduced traffic congestion**; proximity to **frequent transit service**; **easy walking and biking access to commercial services** (especially fresh food), **parks and open space**.

The cultural resources in these districts enhance the character and attractiveness of Santa Barbara, and therefore need to be protected and supported. Additional protections are recommended for **historic resources** to include **buffers**, applied to both districts and stand alone resources, which would include reduced residential densities and building height restrictions. A **Public Art Master Plan** is recommended to complement the existing Arts District and beyond.

The Commission would like the policies to be developed and implemented to protect historic resources, including El Pueblo Viejo buffers such as the 100-foot area presented in the Staff Report, as well as a special treatment area around the Presidio to ensure preservation of the Presidio and its context.

Average Unit Sizes: The Variable Density ordinance would be amended to base future multi-family residential densities on an average unit size, **targeted at 1,000 square feet**, rather than on the number of bedrooms. The average unit sizes are supported by both minimum and maximum densities, based on land use designation, i.e. Med-High or High Density. This approach focuses on two bedroom units but provides density incentives for constructing more, smaller units. The “average” thus allows the flexibility for a few larger units that essentially subsidize the smaller units. See Attachment 2, *High Density Average Unit Sizes Table*.

Residential Density: For most residential designations, including the single family, medium (duplex), and medium-high (multi-family) neighborhoods, no density change is proposed. For the high density residential and commercial zones, the existing standard using “Variable Density” is a range from 15 to 27 dwelling units per acre, and what is proposed is a new base density range of **27- 45 dwelling units/acre (du/ac)**. This is recommended in conjunction with the restriction on unit sizes (see above), which will help to reduce the overall size of proposed projects.

For projects that demonstrate significant **Community Benefit**, such as the Adaptive Re-use of an historic structure, apartments with 3+ bedrooms, or projects with a substantial percentage of affordable units, a maximum of between **46 - 60 du/ac** would be available on a case-by-case basis, with a super majority vote of the Planning Commission making findings of sound community planning.

Building Heights: Overall maximum building heights are not proposed to change, although the Planning Commission recommends the majority of buildings be constructed in the **two- to three-story range; fourth story** elements would only be a possibility for exceptional Community Benefit projects approved with a super majority vote of the Planning Commission making findings of sound community planning.

Housing Overlays: A **50% density increase for rental and employer** housing projects is proposed within designated targeted areas of the Downtown, Haley/Cota street corridors, and Milpas street corridor. The primary recommended housing policy emphasis is **to encourage workforce housing** in smaller buildings through the

immediate adoption of the Average Unit Size ordinance, a rental/employer housing overlay, and reduced residential parking requirements.

Residential Parking Downtown: Residential parking standards for the high density multi-family designations would be limited to a maximum of **1.5 spaces per unit**. In addition, any spaces provided beyond 1.0 per unit would be required to be “**unbundled**” (sold separately) from the cost of the residential unit. The intended result is to both reduce the size of the buildings and cost of the residential units.

Transportation Demand Management (TDM): The Planning Commission recommends support for a **robust TDM package** in the Downtown, as identified in the DEIR for effective traffic congestion mitigation. Without further regulation, traffic congestion could increase dramatically over the next twenty years under each of the four growth scenarios analyzed in the DEIR. The traffic model identifies **parking pricing** as the most effective component of TDM, reducing congestion of all trips by approximately 75 - 85% (trips generated by both existing development and any new increment of growth).

Some merchants in the Downtown are concerned about the impact of parking pricing on local business and the economic vitality of the area. Such a TDM program will need to be carefully developed over the next few years with input and support from business and merchants. If a more robust TDM program is implemented, it would need to be phased gradually in combination with other economic stimuli. The City needs to work alongside the business leaders and stakeholders to engage the broader economic and social issues, to improve the way local residents and visitors live and interact with the Downtown.

Inclusionary Housing: A **25% inclusionary** housing requirement is proposed to replace the existing 15% standard applied to for-sale condominium and subdivision projects. The details of how this increased requirement would be applied will need to be developed, particularly in light of the other changing development standards such as densities, parking requirements, and historic preservation standards which provide both “carrots” and “sticks”.

In general, the **for-sale residential development standards** need further work in order to ensure Plan Objectives are being met, neighborhood character is protected, the standards are internally consistent, and the results are operational. Two key Plan Objectives for future projects are: 1) compatibility with the existing built (and natural) environment, and 2) maximizing the potential for affordable housing, where feasible. The use of Floor Area Ratios and Form Based Codes is very promising for meeting these dual objectives; however, these tools will take time and resources to develop.

Second Units: The Planning Commission recommends the **relaxation of second unit standards**, such as unit size limitations, lot size limitations, affordability requirements, and tandem parking restrictions, as a measure to provide **more diverse work force housing**. The location of these units would continue to be prohibited in high fire districts, and other issues would need to be further examined such as: preferred

locations adjacent to transit and commercial services; parking adequacy in single family neighborhoods; and Floor Area Ratios limits consistent with the Neighborhood Preservation Ordinance.

NEXT STEPS:

The purpose of the work session is for the City Council to provide feedback and direction on the Planning Commission's recommendations. Following direction from the Council at this work session, staff will proceed to make further refinements to the recommended policies and environmental analysis. Staff anticipates returning to the Planning Commission during the summer to discuss the proposed Development Plan Ordinance amendments, and then in mid-September for the certification of the Final EIR, and final recommendation to the Council. Staff will then prepare final recommendations, including the necessary findings, for Council adoption, anticipated in November.

BUDGET/FINANCIAL INFORMATION:

This is an information work session. Council policy direction or funding decisions would be presented for action at future Council meetings.

- ATTACHMENTS:**
1. List of GPU & DEIR Public and Commission Comments Received 5-17-10
 2. High Density Average Unit Sizes Table

Note: A reading file has been provided to the Council including the following documents:

1. A binder containing all the letters and comments listed in Attachment 1.
2. Planning Commission Staff Reports and Power Point Presentations for the meetings of April 28/29, May 6, and June 3, 2010.

PREPARED BY: John Ledbetter, Principal Planner

SUBMITTED BY: Paul Casey, Assistant City Administrator/Community Development

APPROVED BY: City Administrator's Office

Plan Santa Barbara Draft General Plan Update and Draft Program EIR
Public Comments Received 5-17-10 (Amended 6-3-10)

Agencies - Letters

California Department of Fish and Game
 California Department of Parks & Recreation (2 – 5/5 and 5/13)
 California Department of Transportation
 California Governor’s Office of Planning and Research
 California Public Utility Commission
 California Regional Water Quality Control Board
 Montecito Water District
 Santa Barbara County Air Pollution Control District
 Santa Barbara County Association of Governments
 Santa Barbara County Public Health Department
 Santa Barbara County Executive Office, Planning & Development, Fire Department
 Santa Barbara Metropolitan Transit District
 U.S. Department of Fish & Game

Organizations - Letters

Allied Neighbors Association
 Citizens Planning Association (2 – 4/26, 5/17)
 Coalition for Community Wellness
 Coalition for Sustainable Transportation
 Coastal Housing Coalition
 Community Environmental Council (2 – 4/28, 5/17)
 League of Women Voters (2 - 4/26, 5/6, 5/17)
 Montecito Association (3 – 4/27, 5/5, 5/17)
 Pearl Chase Society
 Santa Barbara Association of Realtors
 Santa Barbara Conservancy
 Santa Barbara Downtown Organization
 Santa Barbara For All (2 - 4/27, 5/5)
 Santa Barbara Trust for Historic Preservation
 Upper East Association (2 – 4/18, 5/14)

Individuals - Letters

John M. Ackerman, M.D.
 Gil Barry
 J’ Amy Brown
 John P. Campanella
 Christopher J. Cintas
 Norbert Dall (3 – 4/27, 5/17, 5/17)
 Blair S. Edwards
 Tracy Fernandez
 Janice M. Hubbell, AICP
 Peter Walker Hunt
 Wanda Livernois
 Joan Livingston
 Catherine McCammon
 Richard A. Oliver
 Judith Dodge Orias (2 – 4/26, 5/11)
 Joe Rution (4/28, 4 on 5/17)

Individuals - Letters (cont.)

Deborah Slaght
Sally Spahr
Paula Westbury (3 – 3/23, 4/27, 5/5)
Mark Whitehurst
Paul R. Zink
Elings Park Commenters:
Els & Dennis Andersen
Elizabeth Becker
Steve and Sharen Comstock
Bruce Giffin
Michelle Howard
James Johnson and Karin Hodin
Theo Kracke
Paul C. Kuhn
Ron and Jackie Lincoln
Linda G. Melchiori
Hugh Michaels
Timothy Leigh Rodgers, M.D.
Charles Vehrs
Lori Williams

Planning Commission Public Hearings - Public Comments

April 28 and May 6, 2010 Hearings - Public Comments

Agencies

Richard Roselle, California State Parks, Channel Coast District
Steve Maas, Santa Barbara Metropolitan Transit District

Organizations

Cathie McCammon, President, Allied Neighborhood Association
Paul Hernadi, Citizens Planning Association
Margaret Weiss, Coalition for Community Wellness
Debbie Cox Bultan, Coastal Housing Coalition
Megan Birney, Community Environmental Council
Connie Hannah, League of Women Voters
Kellam DeForest, Pearl Chase Society
Mickey Flacks, Santa Barbara For All
Brian Holfer, architect, Santa Barbara For All
Joe Andrulaitis, architect, Santa Barbara For All
Lisa Plowman, planner, Santa Barbara For All
Randy Rouse, Santa Barbara Downtown Organization
Jerry Jackman, Executive Director, Santa Barbara Trust for Historic Preservation
Fred Sweeny, Vice Chair, Upper Eastside Association

Individuals

John M. Ackerman, MD
Linda Anderson
Gil Berry
Norbert Dall, rep. Thomas Falkay
Peter Hunt, AIA
Jean Holmes
Kristen Jetson Fuse
Theo Kracke
Deborah Slaughter
Paul Zinc

June 3, 2010 Planning Commission Public Hearing - Public Comments

Organizations

Debbie Cox Bultan, Coastal Housing Coalition
Michael Chiacos, Community Environmental Council
Randy Rouse, Santa Barbara Downtown Organization and Parking Committee
Connie Hannah, League of Women Voters
Laura Bridley, Montecito Association
Mickey Flacks, Santa Barbara For All
Lisa Plowman, Planner, Santa Barbara For All

Individuals

Paul Hernadi
Bill Marks
Joe Rution

City Commissions, Committees, and Department Staff

City Commissions and Committees Meetings

Planning Commission Comments Summary – April 29 and May 6, 2010
Planning Commission Comments Summary - June 3, 2010
Creeks Advisory Committee - Letter
Parks and Recreation Commission - Letter
Transportation & Circulation Committee Comments Summary– April 22, 2010
TCC/ Downtown Parking Committee Joint Meeting – Comments Summary May 13, 2010
Water Commission - Letter

Individual Comments from City Commission/Committee Members

Mark Bradley
Keith Coffman-Grey
Sheila Lodge (5/4, 5/17)
Keith Rivera, AIA
Russell R. Ruiz

Staff Comments

Chris Hansen, Bldg. Inspector/Plan Check Supervisor

FILENAME \p H:\Group Folders\PLAN\Long Range Planning\PlanSB\Council\June 2010\List of Draft GPU and DEIR
Commenters 6-3-10.doc

Plan Santa Barbara
High Density Residential Land Use Designation
Recommended Average Unit Size Table

Table: 2: High Density Residential

Average Unit Size	Base Density
1000 sq ft	27 du/ac
965 sq ft	28 du/ac
930 sq ft	29 du/ac
900 sq ft	30 du/ac
870 sq ft	31 du/ac
845 sq ft	32 du/ac
820 sq ft	33 du/ac
800 sq ft	34 du/ac
770 sq ft	35 du/ac
750 sq ft	36 du/ac
730 sq ft	37 du/ac
710 sq ft	38 du/ac
690 sq ft	39 du/ac
675 sq ft	40 du/ac
660 sq ft	41 du/ac
645 sq ft	42 du/ac
630 sq ft	43 du/ac
615 sq ft	44 du/ac
600 sq ft	45 du/ac

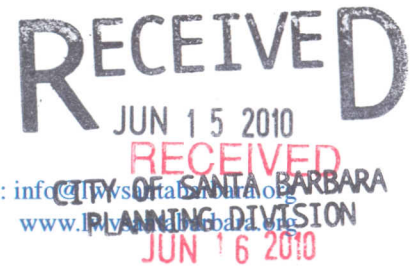
CORRESPONDENCE



LEAGUE OF WOMEN VOTERS®
OF SANTA BARBARA

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City of Santa Barbara Mayor, Council Members, and Planning Commissioners
June 13, 2010

CITY CLERK'S OFFICE
SANTA BARBARA CA

Subject: Discussion of Approval of the Draft Plan Santa Barbara on 6-22-10

The League of Women Voters of Santa Barbara has worked closely with the City throughout our 71 year history, beginning with a campaign to eradicate rats during the 1940's! The League has always been involved in City planning, working on the original General Plan and all its subsequent updates. In 1988 League praised the amount of public outreach that had been involved in preparing it, and we can do that again today. League thanks the City and the staff for all the workshops, hearings and documents that they have provided to the public. This has kept the public involved for five years.

The League has long had a position urging the City to live within its resources. Our position was probably studied when the City wrote the section which contains the same language. Originally water was one of the main concerns, and it still is one of them, but now many other resources are becoming scarce and more expensive. We think that this Charter section should be the deciding factor in this Update, as it has been in the past. We still disagree with some features in the draft Plan, but we think after some changes have been made, approving it would be much preferable to continuing with our present policies. The Environmental Impact Report (EIR) has clearly shown that the No Project Alternative would have many more negative impacts.

Since 2005 it has been obvious that the pace of growth would be the key issue. It has always been so in Santa Barbara, for every generation. This is because our attractive City and coastal location create a worldwide market for expensive housing here. This makes it close to impossible for people who work here and make moderate salaries to find any place to live in the City. We all agree that is a major problem. With large subsidies from the Redevelopment Agency the City has been able to build excellent low income housing, but recently the market has failed to produce any serious amount of housing for the middle income worker. The result has been a serious jobs/ housing imbalance, and a common desire to try to change that.

League could support a hybrid version of Plan Santa Barbara that would address these housing issues without damaging the charm and character of this historic city. We thank you for creating a new element of the Plan to address our Historic Resources. The League sees Santa Barbara as unique and worthy of protection by the people who live here, as evidenced by the report of the 1998 Downtown-Waterfront Visioning Stakeholder's Committee, which was agreed upon by one hundred community leaders. That report and its vision are still relevant today. For that reason the League opposes the proposed

100 foot setbacks as entirely inadequate, and opposes any high density development around El Pueblo Viejo or other historic areas. We think that a 45 foot height limit is preferable downtown to protect the scenic views and limit traffic congestion.

Non-Residential Development

The League helped to pass Measure E, and thinks it has been very successful. We support limiting future non-residential development to 1 million square feet, even though we understand that much of that may have already been committed. With the arrival of mixed use, commercial development has been expanding too fast.

For-Sale Housing Units

Almost everyone is concerned about the development of more high end condos, and their effect on the jobs/housing imbalance. We can support a policy of requiring 25% inclusionary, instead of the present 15%, and requiring smaller units. However, we have concern that inclusionary may never produce enough affordability to be continued. We do not support any additional increase in density, or any bonus densities, and in fact further restrictions may be needed to prevent excessive market rate development.

Rental and Employer Based Units

Everyone also seems to agree that we desperately need more rental units. We understand that you want to incentivize their production. However, we strongly oppose any increase beyond the present 15-27 units per acre as a base density. With 15-27 units, we agree with the Planning Commission that a 50% density increase could be allowed. However, it will be absolutely essential to prepare covenants that permanently prohibit any conversion of such units to for-sale condominiums.

Public Services and Capital Improvements

The League is endorsing the figures used in the Low Growth Scenario because they will require so few expensive expansions of both public services like police, fire, water, open space and energy, and less need for major capital improvements. Permitting less growth when the City will have limited income will allow you to live within your financial resources during difficult economic times.

Adaptive Management Program

We support intensive use of Adaptive Management to control the pace of development and test the availability of key resources.

Traffic Demand Management (TDM)

Nationwide the League supports efforts to reduce greenhouse gases and to reverse climate change. If the City had really adequate transit, people would not need to live downtown in order to use it. Because we do not think that current plans for more density will produce condos that working people can afford, we do not support faster growth. We do support applying some TDM proposals to Plan Santa Barbara in a gradual manner, and only with the approval of the downtown merchants if they will be affected by them.

CONCLUSIONS:

The League of Women Voters has been pleased to be able to participate in the development of the draft Plan Santa Barbara because we know how important it is. We have seen that slow growth policies over a hundred years have preserved the City's charm and character, and we feel that they should be continued with the Lower Growth Alternative figures incorporated into Plan Santa Barbara. During the League's critique of the Environmental Impact Report we pointed out that the Lower Growth Alternative is clearly the Environmentally Superior Alternative, and we have asked that it be described as such in the final document.

With the several changes that we have mentioned, we think that League could support Plan Santa Barbara. We have noted that on April 22 the UCSB Economic Forecast told the City's businessmen that the reason that Santa Barbara County has suffered much less than most in the current recession is because of the slow growth policies that have restrained construction spending and job growth on the South Coast. They noted that if you put curbs on growth during a boom period, the City won't suffer as much when the bust arrives. And we want to add that all of us will have a much more pleasant quality of life in the meantime.

A handwritten signature in cursive script that reads "Connie Hannah". The signature is written in dark ink and is positioned above the printed name and title.

Connie Hannah, First Vice-President
for the Sustainable Communities Committee of the League of Women Voters

Tschech, Susan

From: Rodriguez, Julie on behalf of Community Development PC Secretary
Sent: Wednesday, June 16, 2010 4:38 PM
To: Bruce Bartlett; Deborah L. Schwartz; Jacobs, Charmaine; Jostes, John; Larson, Stella; Lodge, Sheila; Michael Jordon
Cc: Kato, Danny; Feliciano, Gabriela P.; Vincent, Scott; Tschech, Susan; Dayton, Rob; Gularte, Beatriz; Ledbetter, John; Nares, Adam; Shelton, Barbara; Unzueta, Irma; Weiss, Bettie
Subject: FW: Plan Santa Barbara

From: D.H. von Wittenburg [mailto:vonwitt1@cox.net]
Sent: Wednesday, June 16, 2010 2:52 PM
To: Community Development PC Secretary
Subject: Fw: Plan Santa Barbara

Dear Secretary:

This is written by an active resident of the Montecito Community because I am concerned about how Plan SB may make changes detrimental to the uniqueness and semi-rural character of our Montecito 'Village'.

Without consideration of our Montecito Community Plan there will undoubtedly be greater density on Coast Village Road resulting in more traffic impact and may require many cars to park by residences near Coast Village Road. Water usage would certainly be higher, compatibility with the semi-rural atmosphere might not be maintained, and our Water District would undoubtedly have less available water for Montecito residents.

We love our unique and historical area and I hope Plan Santa Barbara will be designed with input from our community and passed before it's too late to maintain what we have now as much as possible.

Thank you for your consideration,

Jean von Wittenburg

6/17/2010



CITIZENS PLANNING ASSOCIATION OF SANTA BARBARA COUNTY, INC.
916 Anacapa Street, Santa Barbara, CA 93101
805-966-3979 ☐ fax 805-966-3970
<http://www.citizensplanning.org> ☐ info@citizensplanning.org

To: City Council and Planning Commission
CC: John Ledbetter, Bettie Weiss
From: Citizens Planning Association
Date: June 19, 2010
Re: Plan Santa Barbara

Three Citizens Planning Association (CPA) committees have submitted numerous documents (including an 18-page brochure) concerning Plan Santa Barbara. While these documents were developed by our General Plan Update Committee, Comprehensive Planning Committee, and South County Land Use Committee, they are statements from CPA as a whole. As such, they have continued our Association's fifty-year-old tradition of helping the decision makers plan for sustainable growth within the limits of Santa Barbara's resources.

So, we thought it would be helpful to summarize CPA's input on Plan Santa Barbara as it stands today. First of all, we want to express our appreciation to staff for their hard work on Plan Santa Barbara. It is obvious that staff has attempted to be comprehensive in addressing a very large number of planning issues. In particular, we acknowledge the diligence with which thousands of pages of documents have been produced and disseminated, and hundreds of questions from the community have been answered before, at, and since the successful March 18th Open House.

Last but not least, we were pleased that staff has agreed to devote a separate Element to Historic Resources. We trust that this Element will be written in the spirit of the following Sustainability Principle, formulated on p. 25 of the Draft General Plan (March 2010):

"Historic resources and the small town character of Santa Barbara need to be protected both downtown and in the neighborhoods by preserving, maintaining and re-using historic structures, and by preserving and enhancing: the human scale of architecture; public open space; landscaping; neighborhood-serving commercial uses; and public views."

We realize that Plan Santa Barbara is still a work in progress. Our comments below are intended to reflect the direction of pertinent discussions to date and should be considered provisional. They address (A) areas where significant improvements over existing policies have been proposed and widely agreed upon, and (B) areas where there is still room for improvement and more work needs to be done.

A. Significant Improvements over Existing Policies:

A-1. We support changing the basis for the **Variable Density Ordinance** from bedroom count to unit size -- provided that the 1,000 square foot average and the existing density limits prevail.

A-2. We recognize the need to improve the jobs/housing balance. In particular, we support increasing the **inclusionary percentage** of workforce housing from 15% to 25% and codifying even greater **discretionary bonus densities** (between 50% and 100%) for rental and/or employer-subsidized residential developments. Given that such policies would result in a significant increase in density, we suggest using a three-year trial period to assess their impact and starting the experiment with the highest base density for commercial and multifamily zones to be set at the so-called Medium High Density of 15 to 27 dwelling units per acre. (See related comments below under B-1.)

A-3. We applaud staff's developing a "hybrid" scenario of carefully selected features from all four scenarios considered so far (Plan Santa Barbara, No Project Alternative, Lower Growth Alternative, and Additional Housing Alternative). We believe widespread community support could emerge for the choice of a **hybrid scenario** along the following lines:

- New nonresidential development of 1,000,000 square feet,
- New residential development of 2,800 dwelling units,
- Variable Density with affordability bonuses as outlined above,
- Selected Travel Demand Management policies on a two-year trial basis,
- Historic preservation in keeping with existing City ordinances and policies, as well as with the Secretary of the Interior's standards and guidelines, and
- An Adaptive Management Program that triggers a reduction in projected growth whenever shortfalls occur in the corresponding availability of natural, infrastructural, or financial resources.

B. Recommendations for Further Improvement:

B-1. We are concerned about the potential community impacts from up-zoning large commercial and multifamily areas to the **High Density limit** of 27 to 45 units per acre recently embraced by the majority of the Planning Commission. Further analysis is required to assess the impacts when bonus densities of up to 100% are added to this already high density baseline. For example, with a 25% inclusionary requirement, such a baseline could result in mostly market-rate condominium developments with 56 (45 + 11) units-per-acre. And the same baseline could yield the respective total per-acre units of 67 (45 + 22) or even 90 (45 + 45) units- per-acre whenever a 50% or 100% rental or employer-subsidized housing incentive is added.

We recommend, as stated in A-2 above, that Plan Santa Barbara embark on a three-year trial using the Medium High Density of 15 to 27 units-per-acre limit with mandatory density bonuses of 25% for inclusionary workforce housing and up to 100% discretionary bonus density for rental or employer subsidized housing. This trial period, in conjunction with other traffic and parking related programs, would provide staff and decision makers with an opportunity to study the actual impacts of increased density and report back to the community on the results of the trial.

B-2. Out of concern for the health and safety of Santa Barbara residents, we would like to see staff re-evaluate the **setback requirements** from major roadways. The California Air Resources Board urges a 500-foot minimum setback from freeways such as Highway 101, and the Santa Barbara County Air Pollution Control District has recommended that the city comply with the state guidelines. An increasing number of scientific studies have suggested potential links between traffic-generated air pollution and the health of people residing near traffic corridors with 10,000 Average Daily Trips. Plan Santa Barbara as currently written would allow new residential developments to be permitted without adequate setbacks from air pollution generated by heavy traffic.

We recommend that new residential developments observe a 500-foot distance from Highway 101 and that all new residential developments in the city be required to help protect residents from excessive air pollution with generously landscaped and appropriate setbacks.

B-3. With respect to preserving our quality of life in Santa Barbara, we still believe that some **consultants' projections** could benefit from further analysis. These include, but are not limited to: home building costs, "necessary" developer profit margins, trip generation figures, and congestion forecasts based primarily on PM peak hour traffic at selected intersections (rather than on around-the-clock, mid-block conditions prevailing downtown and on Upper State Street). Some of these projections provide the basis upon which many of Plan Santa Barbara's policy preferences are based.

We recommend that staff and decision makers review the community's feedback and reevaluate various consultant reports (e.g. the Santa Barbara Development Feasibility Study and the Travel Demand Model) in light of the public discussion.

B-4. The Draft Environmental Impact Report identifies some innovative **mitigations**. However, some proposed mitigation measures for the impacts of growth might have adverse impacts of their own. For example, the costs of living in Santa Barbara would significantly increase if the city finds it necessary to implement such measures as desalination, technological improvements in water recycling and solid waste disposal, as well as enhanced fire and police protection.

We recommend, as stated in A-3 above with respect to the Adaptive Management Program, that decisions about growth-inducing policies be directly tied to the City's ability to fund and enforce mandatory mitigations.

B-5. Features of Plan Santa Barbara which could benefit from more focused attention include **adaptive re-use** and the unintended impacts of **incentivizing second units**. Further consideration for ways to encourage adaptive re-use instead of demolitions could save energy and other natural resources while reducing waste and pollution. Encouraging second units required improved analysis of the potential effects they could have on: the availability of open space, traffic congestion, and increasingly crowded on-street parking in the affected neighborhoods.

We recommend that Plan Santa Barbara safeguard the character of single-family neighborhoods and avoid transforming them into de-facto duplex zones without careful consideration of the tradeoffs.

Thank you again for the years of research and information sharing which helped to get Plan Santa Barbara to where it is today. We eagerly look forward to working with the City to forge the best Plan Santa Barbara possible and then to see it carried out.